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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
EDWARD PAGE,  
  
Defendant.

CASE NO. 1:21-CR-00227-JLT-SKO  
  
STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
ORDER  
  
DATE: September 7, 2022  
TIME: 1:00 p.m.  
COURT: Hon. Sheila K. Oberto

This case is set for status conference on September 7, 2022. By this stipulation, defendant now moves to vacate the status conference and set this case for a change of plea hearing before Judge Jennifer L. Thurston on October 7, 2022, at 9:00 a.m. and to exclude time between September 7, 2022, and October 7, 2022, under 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4].

1. The parties agree and stipulate, and request that the Court find the following:

a) The government has represented that the discovery associated with this case includes investigative reports and related documents, media evidence including cell phone extractions, photographs, search warrant affidavits, and social media account data. All this discovery has been either produced directly to counsel and/or made available for inspection and copying.

b) Counsel for defendant desires additional time to consult with his client and prepare for the change of plea and sentencing.

1 c) Counsel for defendant believes that failure to grant the above-requested  
2 continuance would deny him/her the reasonable time necessary for effective preparation, taking  
3 into account the exercise of due diligence.

4 d) The government does not object to the continuance.

5 e) Based on the above-stated findings, the ends of justice served by continuing the  
6 case as requested outweigh the interest of the public and the defendant in a trial within the  
7 original date prescribed by the Speedy Trial Act.

8 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
9 et seq., within which trial must commence, the time period of September 7, 2022 to October 7,  
10 2022, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code  
11 T4] because it results from a continuance granted by the Court at defendant's request on the basis  
12 of the Court's finding that the ends of justice served by taking such action outweigh the best  
13 interest of the public and the defendant in a speedy trial.

14 2. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
15 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
16 must commence.

17 IT IS SO STIPULATED.

18  
19  
20 Dated: August 24, 2022

PHILLIP A. TALBERT  
United States Attorney

21  
22 /s/ JUSTIN J. GILIO  
JUSTIN J. GILIO  
Assistant United States Attorney

23  
24  
25 Dated: August 24, 2022

/s/ Richard Beshwate  
Richard Beshwate  
Counsel for Defendant  
Edward Page

**ORDER**

IT IS SO ORDERED.

DATED: 8/24/2022



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THE HONORABLE SHEILA K. OBERTO  
UNITED STATES MAGISTRATE JUDGE